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GHC Comments on Energy Demand Forecast Inputs and Assumptions Workshop

Additional submitted attachment is included below.

August 20, 2025

Email to: docket@energy.ca.gov

Docket Number: 25-IEPR-03

Subject: GHC's Comments on August 6, 2025 Workshop

Re: Comments of the Green Hydrogen Coalition Regarding the August 6 Workshop on Energy Demand Forecast Inputs and Assumptions

I. INTRODUCTION & SUMMARY

Pursuant to the July 22, 2025 Revised Scoping Order and the Notice of Workshop in Docket No. 25-IEPR-03, the Green Hydrogen Coalition respectfully submits these comments in response to the IEPR Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions, held on August 6, 2025. The GHC was disappointed in the potential exclusion of hydrogen production modeling in the 2025 IEPR Forecast and believes it should be included in the forecast.¹ As the GHC noted in our comments on the July 29th workshop, “The IEPR is uniquely positioned as the go-to program for sourcing accurate and reliable forecasting data.”² Incorporating hydrogen production into the mid- and long-term modeling forecasts is necessary to inform and guide the many decarbonizing efforts by the state ongoing in the status quo. Inclusion in the forecast is a market signal to developers and producers that California is committed to green hydrogen and economywide decarbonization.

The GHC is an educational 501(c)(3) non-profit organization.³ GHC was formed in 2019 to recognize the game-changing potential of clean renewable hydrogen to accelerate multi-sector decarbonization and combat climate change. GHC's mission is to facilitate policies and practices

¹ Javanbakht, Heidi; Gee, Quentin. “2025 IEPR Forecast Overview” *California Energy Commission*, August 5, 2025. <https://efiling.energy.ca.gov/GetDocument.aspx?tn=265227>. Accessed on August 19, 2025.

² “GHC Comments on Firm Zero-Carbon Resources & Hydrogen” *Green Hydrogen Coalition*, August 19, 2025. <https://efiling.energy.ca.gov/GetDocument.aspx?tn=265712&DocumentContentId=102563>. Accessed on August 20 2025.

³ <https://www.ghcoalition.org/>

that advance clean renewable hydrogen production and use in all sectors of the economy to accelerate a carbon-free energy future. Our sponsors include foundations, clean renewable energy users and developers, utilities, and other supporters of a reliable, affordable clean renewable hydrogen fuel economy for all. The GHC's approach is focused on scaling clean renewable hydrogen as a viable and cost-competitive alternative to fossil fuels.

II. HYDROGEN PRODUCTION SHOULD BE MODELED IN THE MID- AND LONG-TERM FORECASTING OF THE 2025 IEPR

Modeling hydrogen production in the 2025 IEPR Forecast is necessary for California to achieve its decarbonization goals in the power sector and the hard-to-abate industries that cannot be addressed by electrification. The recent passage of the One Big Beautiful Bill Act (OBBBA) limited the amount of time for developers to access 45V tax credits by phasing out the program faster than planned in the Inflation Reduction Act (IRA). Specifically, facilities that begin construction after December 31, 2027, will no longer be eligible for the credit.⁴ To meet the deadline, many developers are accelerating their efforts to get their programs online. IEPR forecasting can inform and guide the state and local governments as they work to meet the accelerated timelines from the federal government.

As a long lead time resource, clean hydrogen needs to be modeled in the IEPR to ensure the other state proceedings have proper guidance for planning purposes, both for electric sector as well as gas sector planning. As the IEPR Hydrogen proceeding highlighted, the IEPR can inform

⁴ "One Big Beautiful Bill Act" 14 Aug. 2025, www.congress.gov/119/plaws/publ21/www.congress.gov/119/plaws/publ21/PLAW-119publ21.pdf. Accessed 19 Aug. 2025.

and guide the decisions occurring at the CPUC.⁵ With the CPUC considering long-term gas system planning, this is the perfect time to include hydrogen in the forecast. Additionally, the CPUC is also considering an updated approach to clean power procurement, and the options could be guided by the IEPR forecast. GHC and others have noted the need for greater consideration of long lead time resources, like hydrogen, and the forecast from the CEC is critical to informing that planning process.

The pathways for zero-carbon resources, like hydrogen, necessitate inclusion into the 2025 IEPR because of their impact to the state's energy infrastructure. Pathways such as electrolytic hydrogen production, steam methane reformation of biogas and non-combustion thermal conversion of waste biomass to clean hydrogen will require significant changes to how hydrogen is currently produced and transported. These new renewable production pathways require electricity, and the resulting gaseous hydrogen requires pipeline transport to achieve scaled, low delivered cost. As the GHC recently noted,

“The IEPR could greatly assist with this effort by developing reasonable future hydrogen demand scenarios that factor in hydrogen demand from the production of renewable fuels. Additionally, the IEPR could include scenarios for reducing delivered hydrogen costs through the repurposing of existing pipelines and identification of needed new pipelines to achieve an optimized system connected to geologic storage.”⁶

As the only commercially viable seasonal energy storage solution for renewable energy, hydrogen should be included in the forecast, especially as a means to help reduce wasteful curtailment of renewable electricity.

⁵ “Hydrogen-Related Activity at the CPUC” California Public Utilities Commission, 29 July 2025, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=265042&DocumentContentId=101820>. Accessed 19 Aug. 2025.

⁶ GHC Comments on IEPR July 29 Workshop, at 10.

The inclusion of large new loads, such as data centers, warrants including hydrogen because hydrogen production represents a potentially new large electric load, and the resulting hydrogen can be a viable solution for providing renewable alternatives for meeting new electric demand. Hydrogen fueled power generation is a viable pathway for dealing with these new large loads because it is clean, dispatchable, and can harness the state's curtailed renewable power and vast abundant renewable resources. It can also be a modifiable energy intensive load and should be modeled in the forecast to ensure it is fully considered in the state's mid and long-term decarbonization plan, both as a new load and as a potential flexible grid resource.

III. CONCLUSION

GHC believes the 2025 IEPR Forecast should include hydrogen for the reasons listed above and stated in previous comments in the IEPR proceeding. GHC appreciates the opportunity to provide these comments on the August 6 Workshop on Energy Demand Forecast Inputs and Assumptions.

Respectfully submitted,

x Tim Kamermayer
Director, Policy & Regulatory
Affairs

GREEN HYDROGEN COALITION